

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

<div style="border-bottom: 1px solid black; height: 1.2em; margin-bottom: 5px;"></div> In re: <div style="border-bottom: 1px solid black; height: 1.2em; margin-bottom: 5px;"></div> LTL MANAGEMENT LLC, <div style="border-bottom: 1px solid black; height: 1.2em; margin-bottom: 5px;"></div> Debtors.	Chapter 11 Case No. 21-30589 Jointly Administered Hon. Michael B. Kaplan
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**APPLICATION FOR AN ORDER FOR ADMISSION *PRO HAC VICE* FOR EILEEN
McCABE**

Pursuant to Rule 101.1 of the Local Civil Rules for the United States District Court for the District of New Jersey and Rule 9010-1 of the United States Bankruptcy Court, District of New Jersey, the undersigned counsel hereby seeks entry of an ordering granting the admission pro hac vice of Eileen McCabe of the law firm of Mendes & Mount, LLP to represent Atlanta International Insurance Company (as successor in interest to Drake Insurance Company); AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania); AIG Europe S.A. (as successor in interest to Union Atlantique d'Assurances S.A.); AIU Insurance Company; ASR Schadeverzekering N.V. (as successor in interest to Assurantiekoor Van Wijk & Co.); Granite State Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; New Hampshire Insurance Company; The North River Insurance Company; Starr Indemnity & Liability Company (as successor in interest to Republic Insurance Company); N.V. Schadeverzekeringsmaatschappij Maas Lloyd (individually and as successor in interest to policies subscribed in favor of Johnson & Johnson by N.V. Rotterdamse Assurantiekas, n/k/a De Ark); and Rheinland Verzekeringen (as successor in interest only to the subscriptions of the former Dutch company Rheinland Verzekeringen) (collectively, the "New Jersey Action Insurers"), in the above-captioned chapter 11 case. In support of the application, counsel submitsthe attached

Certification of Eileen McCabe, and requests that the proposed form of order submitted herewith be entered. Counsel certifies that he is admitted, practicing, and a member in good standing of the Bar of the State of New Jersey.

By: /s/ Louis A. Modugno
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Attorneys for Atlanta International Insurance Company (as successor in interest to Drake Insurance Company); AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania); AIG Europe S.A. (as successor in interest to Union Atlantique d'Assurances S.A.); AIU Insurance Company; ASR Schadeverzekering N.V. (as successor in interest to Assurantiekoor Van Wijk & Co.); Granite State Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; New Hampshire Insurance Company; The North River Insurance Company; Starr Indemnity & Liability Company (as successor in interest to Republic Insurance Company); N.V. Schadeverzekeringsmaatschappij Maas Lloyd (individually and as successor in interest to policiessubscribed in favor of Johnson & Johnson by N.V. Rotterdamse Assurantiekas, n/k/a De Ark); and Rheinland Verzekeringen (as successor in interest only to the subscriptions of the former Dutch company Rheinland Verzekeringen)

Dated: November 22, 2021

CERTIFICATE OF SERVICE

I, Louis A. Modugno, hereby certify that on this 22nd day of November 2021, I caused the foregoing Motion for Admission Pro Hac Vice filed herewith to be served by this Court's CM/ECF System.

/s/ Louis A. Modugno

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:	Chapter 11
	Case No. 21-30589
LTL MANAGEMENT LLC,	Jointly Administered
Debtors.	Hon. Michael B. Kaplan

CERTIFICATION OF EILEEN McCABE, ESQ.

I, Eileen McCabe, Esq., hereby certify as follows:

1. I am a partner with the law firm of Mendes & Mount LLP, with my office located at 750 Seventh Avenue, New York, New York 10019. My telephone number is (212) 261-8283, my facsimile number is (212) 261-8750 and my email address is eileen.mccabe@mendes.com.
2. I make this Certification in support of my application to appear in this case *pro hac vice* pursuant to Local Bankruptcy Rule 9010-1.
3. I have read the Motion and understand the contents thereof. The matters and statements alleged therein are true and correct to the best of my knowledge, information and belief.
4. I was granted authorization to appear *pro hac vice* in this case before Judge J. Craig Whitley in the U.S. Bankruptcy Court for the Western District of North Carolina (Charlotte Division). See Order attached as **Exhibit A**.
5. I have obtained a copy of the Local Bankruptcy Rules and am generally familiar with such Rules. I will comply with all court and ethical rules governing the practice of law before this Court.
6. I have never been disbarred or suspended in any court in which I am admitted to

practice.

7. I have not been the subject of disciplinary action by the bar or courts of any state.
8. I am experienced in bankruptcy matters and am familiar with the provisions of the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure. I have associated with bankruptcy counsel to address insurance-related issues, as necessary, in a number of bankruptcy matters pending in bankruptcy courts for over twenty (20) years, and in this matter have associated with bankruptcy and local counsel who are familiar with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules.
9. I submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the course of this Chapter 11 case.
10. I further agree to pay all fees to the Clerk of the United States District Court for the District of New Jersey and the New Jersey Lawyers' Fund for Client Protection as provided in Rule 101.1 of the Local Rules of the United States District Court for the District of New Jersey.

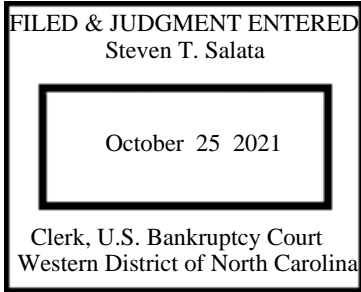
I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

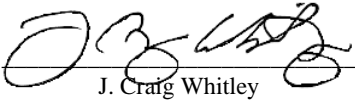
Dated: November 22, 2021

/s/ Eileen McCabe

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EXHIBIT A




J. Craig Whitley
United States Bankruptcy Judge

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:

LTL MANAGEMENT LLC,

Debtors.

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) Chapter 11
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) Case No. 21-30589 (JCW)
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**ORDER GRANTING MOTION FOR ADMISSION *PRO HAC VICE* TO
EILEEN McCABE**

THIS MATTER having come before the undersigned Judge of the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division, upon the Motion for Admission *Pro Hac Vice* for Eileen McCabe filed by Kelsey R. Panizzolo to practice in this Court for the purposes of representing Atlanta International Insurance Company (as successor in interest to Drake Insurance Company); AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania); AIG Europe S.A. (as successor in interest to Union Atlantique d'Assurances S.A); AIU Insurance Company; ASR Schadeverzekering N.V. (as successor in interest to Assurantiekoor Van Wijk & Co.); Granite State Insurance Company; The

Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; New Hampshire Insurance Company; The North River Insurance Company; Starr Indemnity & Liability Company (as successor in interest to Republic Insurance Company); N.V. Schadeverzekeringsmaatschappij Maas Lloyd (individually and as successor in interest to policies subscribed in favor of Johnson & Johnson by N.V. Rotterdamse Assurantiemas, n/k/a De Ark); and RheinLand Versicherungen (as successor in interest only to the subscriptions of the former Dutch company Rheinland Verzekeringen), as co-counsel together with counsel from the law firm of Katten Muchin Rosenman LLP, who is admitted to practice in this Court. It appears to the Court, and the Court so finds, that for good cause shown the motion should be granted.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT, pursuant to Rule 2090-2 of the Local Rules of Practice and Procedure of this Court, Eileen McCabe shall be, and hereby is, admitted *pro hac vice* to practice in this Court in the above captioned chapter 11 case.

This Order has been signed electronically.
The Judge's signature and Court's seal
appear at the top of the Order.

United States Bankruptcy Court

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:	Chapter 11
	Case No. 21-30589
LTL MANAGEMENT LLC,	Jointly Administered
Debtors.	Hon. Michael B. Kaplan

ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is ORDERED.

This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed. R. Civ. Proc. 78, D.N.J. L. Civ. R. 101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that Eileen McCabe be permitted to appear pro hac vice to practice in this Court for the purposes of representing Atlanta International Insurance Company (as successor in interest to Drake Insurance Company); AIG Property Casualty Company (f/k/a Birmingham Fire Insurance Company of Pennsylvania); AIG Europe S.A. (as successor in interest to Union Atlantique d'Assurances S.A.); AIU Insurance Company; ASR Schadeverzekering N.V. (as successor in interest to Assurantiekoor Van Wijk & Co.); Granite State Insurance Company; The Insurance Company of the State of Pennsylvania; Lexington Insurance Company; National Union Fire Insurance Company of Pittsburgh, Pa.; New Hampshire Insurance Company; The North River Insurance Company; Starr Indemnity & Liability Company (as successor in interest to Republic Insurance Company); N.V. Schadeverzekeringsmaatschappij Maas Lloyd (individually and as successor in interest to policiessubscribed in favor of Johnson & Johnson by N.V. Rotterdamse Assurantiekas, n/k/a De Ark); and Rheinland Verzekeringen (as successor in interest only to the subscriptions of the former Dutch company Rheinland Verzekeringen) as co-counsel together with Louis A. Modguno, who is admitted to practice in this Court, provided that pursuant to D.N.J. L. Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices,

orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$150.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District
Court District of New
Jersey
Martin Luther King, Jr. Federal
Building 50 Walnut Street
Newark, N.J. 07102
Attention: Pro Hac Vice Admissions

and it is further

ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of the New Jersey Fund for Client Protection within 5 days of its date of entry.